From:	Lee, Alan
To:	Ruelas, Cynthia
Cc:	Lee, Alan
Subject:	RE: HC_10370_Demolition of Structures at Kapalama Military Reservation - Checklist for risk-based disposal application
Date:	Tuesday, March 10, 2015 11:41:23 AM

You are Welcome, Cynthia…

And Sincerely, Thank YOU for Your Detailed and Pro-Active Assistance in helping to reach a Best And Most Reasonable Resolution of our PCB issue… From My Own (Nuclear) Background, I can relate How Much MORE Successful, Cost&Effort-Effective and Long-Term Program Better your Approach (to Help and Guide) is For ALL Concerned!

R/alan lee

From: Ruelas, Cynthia [mailto:RUELAS.CYNTHIA@EPA.GOV] ; **Sent:** Tuesday, March 10, 2015 7:03 AM
To: Lee, Alan; Jingbo Chang; Myounghee Noh
Cc: Melchor.A.Travens@hawaii.gov; Eunjin Kotkovetz; Dennis Poma; Armann, Steve; Dung.P.Vo; Bert R. Toba, P.E.
Subject: RE: HC_10370_Demolition of Structures at Kapalama Military Reservation - Checklist for risk-based disposal application

Thanks Alan!

.....

Cynthia Ruelas
Environmental Engineer
Permits Section
US Environmental Protection Agency Region 9
75 Hawthorne Street, Mail Code LND-4-2
San Francisco, CA 94105

Tel: (415) 972-3329
Fax: (415) 947-3530
Email: ruelas.cynthia@epa.gov

From: Lee, Alan [mailto:Alan.Lee2@aecom.com]
Sent: Tuesday, March 10, 2015 9:57 AM
To: Ruelas, Cynthia; Jingbo Chang; Myounghee Noh
Cc: Melchor.A.Travens@hawaii.gov; Eunjin Kotkovetz; Dennis Poma; Armann, Steve; Lee, Alan; Dung.P.Vo; Bert R. Toba, P.E.
Subject: HC_10370_Demolition of Structures at Kapalama Military Reservation - Checklist for risk-based disposal application

Hello, Cynthia

Thank You for the Reminder(s) and Summary of Feedback;

1) **RE: NOTIFICATION**

Notification of the PCB release was made this morning to the National Response Center (NRC @ 1-800-424-8802):
By Myounghee Noh and me

The NRC Summary is Extracted BELOW:

----- EXTRACTED Message -----

From: HQS-PF-fldr-NRC@uscg.mil [mailto:HQS-PF-fldr-NRC@uscg.mil]
Sent: Tuesday, March 10, 2015 6:23 AM
To: Lee, Alan
Subject: NRC#1110148

NATIONAL RESPONSE CENTER 1-800-424-8802
*** For Public Use ***
Information released to a third party shall comply with any
applicable federal and/or state Freedom of Information and Privacy Laws

Incident Report # 1110148

INCIDENT DESCRIPTION

*Report taken at 12:12 on 10-MAR-15
Incident Type: FIXED
Incident Cause: CRIMINAL INTENT
Affected Area:
Incident occurred on 18-NOV-14 at 12:00 local incident time.
Affected Medium: LAND / GROUND

SUSPECTED RESPONSIBLE PARTY

Organization: AECOM
HONOLULU, HI

INCIDENT LOCATION
KAPALAMA MILITARY RESERVATION County: HONOLULU
ADJACENT TO BUILDING 905
City: HONOLULU State: HI

RELEASED MATERIAL(S)

CHRIS Code: OTF Official Material Name: OIL, MISC: TRANSFORMER
Also Known As:
Qty Released: 850 GALLON(S)
CHRIS Code: PCB Official Material Name: POLYCHLORINATED BIPHENYLS
Also Known As:
Qty Released: 582 PART(S) PER MILLION

DESCRIPTION OF INCIDENT

CALLER STATED THAT APPROXIMATELY 850 GALLONS OF TRANSFORMER OIL WAS RELEASED ONTO THE GROUND FROM A PAD MOUNTED TRANSFORMER. THE CALLER STATED THAT ON JANUARY 20, 2015 THEY RECEIVED NOTIFICATION THAT THE OIL CONTAINED 582 PPM OF PCBS. NO WATERWAYS WERE IMPACTED.

INCIDENT DETAILS

Package: NO
Building ID:
Type of Fixed Object: TRANSFORMER
Power Generating Facility: NO
Generating Capacity:
Type of Fuel:
NPDES:
NPDES Compliance: UNKNOWN

IMPACT

Fire Involved: NO Fire Extinguished: UNKNOWN

INJURIES: NO Hospitalized: Empl/Crew: Passenger:
FATALITIES: NO Empl/Crew: Passenger: Occupant:
EVACUATIONS:NO Who Evacuated: Radius/Area:

Damages: NO

Closure Type	Description of Closure	Hours Closed	Direction of Closure
Air:	N		
Road:	N	Major Artery: N	
Waterway:	N		
Track:			

Environmental Impact: UNKNOWN
Media Interest: UNKNOWN Community Impact due to Material:

REMEDIAL ACTIONS

RESPONSE WAS HANDLED UPON DISCOVERING THE RELEASE IN 2014.
Release Secured: YES
Release Rate:
Estimated Release Duration:

WEATHER

Weather: UNKNOWN, ºF

ADDITIONAL AGENCIES NOTIFIED

Federal: EPA
State/Local: DOH, HAZ EVAL&ER
State/Local On Scene:
State Agency Number:

NOTIFICATIONS BY NRC

CENTERS FOR DISEASE CONTROL (GRASP) 10-MAR-15 12:22
CG INVESTIGATIVE SERVICE HQ (WFO) 10-MAR-15 12:22
DOT CRISIS MANAGEMENT CENTER (MAIN OFFICE) 10-MAR-15 12:22
U.S. EPA IX (MAIN OFFICE)
FEMA REGION 09 (SITUATION AWARENESS UNIT) 10-MAR-15 12:22
CG-NCC (MAIN OFFICE) 10-MAR-15 12:22
HI CIVIL DEFENSE (MAIN OFFICE) 10-MAR-15 12:22
HI STATE ENERGY OFFICE (ENERGY PLANNER) 10-MAR-15 12:22
HAWAII STATE DNLR (MAIN OFFICE) 10-MAR-15 12:22
NATIONAL INFRASTRUCTURE COORD CTR (MAIN OFFICE) 10-MAR-15 12:22
NOAA RPTS FOR HI (MAIN OFFICE) 10-MAR-15 12:22
NATIONAL RESPONSE CENTER HQ (MAIN OFFICE) 10-MAR-15 12:22
NATIONAL RESPONSE CENTER HQ (AUTOMATIC REPORTS) 10-MAR-15 12:22
ORLANDO INTNL AIRPORT TSA/DHS (INCIDENT MANAGEMENT CENTER) 10-MAR-15 12:22
PACIFIC ISLANDS FISH AND WILD LIFE (MAIN OFFICE) 10-MAR-15 12:22
REPORTING PARTY (RP SUBMITTER) 10-MAR-15 12:22
HI DEPARTMENT OF HEALTH (MAIN OFFICE) 10-MAR-15 12:22
USCG DISTRICT 14 (JRCC) 10-MAR-15 12:22
U.S. NAVY REGION HAWAII (ENVIRONMENTAL SPILL RESPONSE/RECOVERY) 10-MAR-15 12:22

ADDITIONAL INFORMATION

*** END INCIDENT REPORT #1110148 ***

Report any problems by calling 1-800-424-8802
PLEASE VISIT OUR WEB SITE AT http://www.nrc.uscg.mil

--- END OF EXTRACTED E-Message ----------

2) RE: Full Site Investigation

RE: There may be other potential sources of PCBs at the site. An inspection of all potential sources (other PCB transformers) at the site should be conducted. Please include this inspection as something that will be conducted following the PCB remediation activities.

UPDATE: 3/10/2015: All Other Transformers on-site (Approx. 38 each) were Tested and are in the process of removal and disposal (one other) or already removed (~37). This information will be provided in subsequent summaries;

Please advise if you have any questions or concerns regarding the above.

R/alan lee
808-225-2651

Alan G. Lee, P.E.
Resident Engineer
Construction Management, Pacific

DIR CELL: 808.225.2651
Office: 808.356.5391
Fax: 808.356.5386
E: alanlee2@aecom.com

AECOM
1001 Bishop Street
Suite 1600
Honolulu, HI 96813
www.aecom.com

From: Ruelas, Cynthia [mailto:RUELAS.CYNTHIA@EPA.GOV] ; **Sent:** Monday, March 09, 2015 2:34 PM
To: Jingbo Chang; Myounghee Noh; **Cc:** Melchor.A.Travens@hawaii.gov; Lee, Alan; Eunjin Kotkovetz; Dennis Poma; Armann, Steve
Subject: RE: Kapalama Military Base - Checklist for risk-based disposal application

Hello Jingbo,

Thank you for sending me the work plan summary for the PCB spill at the Kapalama military base. I spoke with Steve Armann, manager of the Corrective Action Section, as well as John Beach, our project risk assessor, a bit more regarding our conference call discussion on Tuesday, March 3rd, and the work plan summary you submitted.

Based on my discussion with them, I wanted to provide you with some feedback on the summary as well as a couple other things:

Notification

As previously mentioned, HDOT, the site owner/operator, is currently in violation of TSCA for not reporting this PCB release to the National Response Center (NRC). To date, I have not seen this notification come through. Please notify NRC (1-800-424-8802) of the spill as soon as possible.

Sampling Methodology

Your current sampling methodology proposes removal of the PCB transformer, the concrete pad, and any other stained or visibly impacted surfaces. The depth of the initial excavation is 2 feet below ground surface (bgs). The remediation debris generated from the initial excavation will be shipped off-site to a TSCA disposal facility. Confirmation sampling will then be conducted.

I spoke with Steve Armann and John Beach in more detail regarding multi-incremental sampling (MIS) methodology. As you know, EPA Region 9 is currently having on-going discussions with HDOH regarding the use of this type of sampling methodology, as it applies to corrective action sites overseen by EPA Region 9, and how it can be used in a way that fits into our regulatory framework. The sampling methodology will ultimately need to address: site characterization, protectiveness, and waste characterization. Based on my discussion with them, there are two options for sampling methodologies that we will accept at this point in time:

1. The work plan summary proposes use of MIS and dividing up the area of concern into three decision units (DUs). Samples from two DUs, DU-TSF1 (24' by 22') and DU-A (5' wide perimeter around DU-TSF1), would be sampled and analyzed for total PCBs. The sample from the third DU would be collected, but not analyzed pending results of the two samples from the first two inner DUs. We will accept these DUs and use of MIS methodology for this site. DUs with MIS concentrations lower than the action level do not require additional remediation activities; DUs with MIS concentrations greater than the action level must be removed. For disposal purposes, the MIS result shall be multiplied by the number of increments; (MIS Result) X (# of increments) = result to be used for disposal purposes. If the result is greater or equal to 50 mg/kg, the soil must be disposed of at a TSCA disposal facility.

2. Alternatively, discrete samples may be collected for confirmation. A statistically valid program may be used to determine the number of confirmation samples within the area of concern. I had previously mentioned ProUCL; however, VSP (http://vsp.pnnl.gov/) and DQOPro (I think this program was mentioned by someone on the March 3rd conference call) may be easier and more user-friendly for purposes of this site. If the PCB concentrations in the discrete confirmation samples are below the action level, then no additional excavation is required. If however, the discrete samples are above the action level, then subsequent excavation is required. For the subsequent excavation, if confirmation samples indicate that PCB concentrations are equal to or exceed 50 ppm, the excavated soil must be disposed of at a TSCA disposal facility. If the confirmation sampling results are above the action level,

but below 50ppm, the excavated soil may be disposed of at a non-TSCA disposal facility that will accept the waste.

For sample analysis, please use soxhlet as the extraction method (EPA Method 3540C), if possible. Soxhlet extraction is a more aggressive type of extraction method than ultrasonic extraction (EPA Method 3550C), and thus is EPA R9's preferred extraction method. Most laboratories are able to run a sample using this type of extraction.

Action Level

I spoke with Steve and John a little bit more regarding the action level for this site. The use of Hawaii's cleanup level for commercial/industrial sites, 7.4 ppm, is acceptable, however, one thing that I forgot to mention that Steve and John reminded me of was that the use of this cleanup level would require the site to have a land use control (e.g., land use covenant, deed restriction etc.), regardless of whether or not the long-term use of the site is to remain commercial/industrial. This is to ensure that if land use changes or any intrusive work is conducted in the future in the area where PCBs are present above the residential level, proper mitigation measures are taken to prevent unreasonable risk to human health or the environment. If a land use control already exists for the Kapalama Military Base, then, this is something that could be included as an addendum. If HDOT does not have an existing land use control and would like to avoid incorporating one into the deed, then another option would be to use Hawaii's PCB cleanup level for residential use, 1.1 ppm. We can discuss the action level in more detail if you'd like.

Full Site Investigation

There may be other potential sources of PCBs at the site. An inspection of all potential sources (other PCB transformers) at the site should be conducted. Please include this inspection as something that will be conducted following the PCB remediation activities.

Please let me know if you have any questions or concerns regarding any of the above.

Thanks,
Cynthia

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Cynthia Ruelas
Environmental Engineer
Permits Section
US Environmental Protection Agency Region 9
75 Hawthorne Street, Mail Code LND-4-2
San Francisco, CA 94105

Tel: (415) 972-3329
Fax: (415) 947-3530
Email: ruelas.cynthia@epa.gov

From: Jingbo Chang [mailto:Jingbo.Chang@pcshi.com] ; **Sent:** Tuesday, March 03, 2015 2:44 PM
To: Myounghee Noh; Ruelas, Cynthia
Cc: Melchor.A.Travens@hawaii.gov; Lee, Alan; Eunjin Kotkovetz; Dennis Poma

Subject: RE: Kapalama Military Base - Checklist for risk-based disposal application

Aloha all,

Attached are the brief summary of the work plan for your review. Thanks.

Pacific Commercial Services, LLC

***Please note we have moved to Campbell Industrial Park, our new office address is below: ***

Jingbo Chang, Ph.D.
General Manager/Sr. Env. Scientist
Mailing address: PO Box 235117, Honolulu, HI 96823-3501
91-254 Olai Street, Kapolei, HI 96707
808-545-4599
808-845-9773 fax
808-478-8930 mobile
jingbo.chang@pcshi.com
www.pcshi.com